

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

RALPH L. DOUROS

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

SANTANDER BANK, N.A.

SCOTT POWELL, SANTANDER, N.A. CEO

~~DOVENMUEHLE~~ MORTGAGE, INC.

TARA KOZAK, OFFICE MANAGER,

SANTANDER READING OFFICE

KEVIN MAYERS, SANTANDER AUTH-

ORIZED SIGNER

COMPLAINT

Jury Trial: ☒ Yes ☐ No

(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

**I. Parties in this complaint:**

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	<u>RALPH L. DOUROS</u>
	Street Address	<u>39 PARK RD.</u>
	County, City	<u>BERKS CO., BOTERTOWN</u>
	State & Zip Code	<u>PA. 19512</u>
	Telephone Number	<u>484-574-3180</u>

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name SANTANDER BANK, N.A.  
 Street Address 450 PENN ST.  
 County, City BERKS COUNTY, READING  
 State & Zip Code PENNSYLVANIA, 19602

Defendant No. 2 Name SCOTT POWELL, FORMER (Retired Dec. 2019) SANTANDER, N.A., CEO  
 Street Address 75 STATE ST.  
 County, City SUFFOLK, BOSTON  
 State & Zip Code MASSACHUSETTS, 02109

Defendant No. 3 Name DOVENMUEHLE MORTGAGE INC.  
 Street Address 1 CORPORATE DR.  
 County, City LAKE, LAKE ZURICH  
 State & Zip Code ILLINOIS, 60047-8945

Defendant No. 4 Name TARA KOZAK, OFFICE MANAGER, C.O. SANTANDER  
 Street Address 450 PENN ST.  
 County, City BERKS, READING  
 State & Zip Code PENNSYLVANIA, 19602

## II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

- A. What is the basis for federal court jurisdiction? (check all that apply)  
☒ Federal Questions ☐ Diversity of Citizenship

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? VIOLETION OF AMENDMENT V, PERSON RIGHT TO DUE PROCESS; AND AMENDMENT VII, PRESERVE RIGHT TO TRIAL BY JURY; AND AMENDMENT XIV, RIGHT TO DUE PROCESS AND EQUAL PROTECTION OF THE LAWS(SECTION 1).

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 5

Name KEVIN MAYERS, AUTHORIZED SANTANDER SIGNER

Street Address 450 PENN ST.

County, City BERKS, READING

State & Zip Code PENNSYLVANIA, 19602

Defendant No. 6

Name JUDICIARY, COMMONWEALTH OF PA., SUPREME CRT

Street Address 601 COMMONWEALTH AVE, #4500

County, City DAUPHIN, HARRISBURG

State & Zip Code PENNSYLVANIA, 17106-2575

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C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship N/A

Defendant(s) state(s) of citizenship N/A

### III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? IN BERKS COMMON PLEAS CRT., IN PENNSYLVANIA SUPERIOR CRT. AND IN PENNSYLVANIA SUPREME CRT.

B. What date and approximate time did the events giving rise to your claim(s) occur? FROM NOVEMBER 1, 2018, THE DATE OF FILING OF THE THEN PLAINTIFFS AND NOW DEFENDANTS COMPLAINT IN MORTGAGE FORECLOSURE IN BERKS COMMON PLEAS UNTIL THE DATE OF THIS FEDERAL COMPLAINT AS SIGNED ON PAGE 6 HERETO.

C. Facts: ON THE AFORESAID DATE DEFENDANTS DID IMPROPERLY AND ILLEGALLY FILE WITH THE COURT AN ABSOLUTELY BOGUS COMPLAINT WHICH THEY WERE NOT ABLE TO PROVE IN ANY COURT OF THE PENN- VANIA COMMONWEALTH. THE DEFENDANTS APPEARED TO ACCEPT THE FOLLY OF THEIR WAYS AND EVENTUALLY FILED A PRAECIPE TO WITHDRAW THEIR COMPLAINT. NOT EVEN ONE OF THE COURTS OF THE COMMON- WEALTH WOULD ACKNOWLEDGE THIS UNCONSCIONABLE, VILE AND LOWEST POSSIBLE EXAMPLE OF ABUSE OF PROCESS. WHY ON THIS EARTH WOULD ANY LENDER FORECLOSE ON A MORTGAGE CONTRACT WHICH WAS PAID UP TO DATE WITH NO ENFORCEABLE ARREARAGES? THE ABOVE CAPTIONED PLAINTIFF UNEQUIVICALLY PROVED OVER AND OVER IN ALL PA. COURTS THAT HE WAS CORRECT AND THAT HIS COUNTERCLAIM WAS RIGHT AND JUST. FURTHER, ABOVE CAPTIONED DEFENDANTS WERE PERMITTED TO FLAGRANTLY DISREGARD TIME ALLOWED BY SUPREME COURT RULE TO FILE MOTION TO QUASH IN PA. SUPERIOR COURT, TWENTY-SEVEN DAYS PAST THE DUE DATE OF MAY 20, 2019. YET, WHEN ABOVE CAPTIONED PLAINTIFF'S PETITION TO THE PA. SUPREME COURT WAS RETURNED DUE TO UNTIMELINESS SAID PLAINTIFF WAS FORCED TO THEN FILE A NUNC PRO TUNC PETITION WHICH WAS OF COURSE ALMOST IMMEDIATELY DENIED BY SAID COURT.

What happened to you?

Who did what?

Was anyone else involved?

Who else saw what happened?

INTENTIONALLY LEFT BLANK ~~X~~

**IV. Injuries:**

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. INJURIES ARE OBVIOUS MENTAL AND EMOTIONAL. PLAINTIFF CAN NOT SLEEP WITHOUT KNOWN HIGH DOSE SLEEPING MEDICATION. FURTHER, PLAINTIFF IS QUITE SURE THAT VASCULAR DISEASE WAS PRECIPITATED BY DEFENDANT'S INGLORIOUS, VICIOUS AND UNRELENTING ATTACKS. IN CONJUNCTION WITH FACTS STATED IN PAGE NUMBER 3 ABOVE, THE APEARANCE OF DUE PROCESS DOES NOT EVEN FOR A FLEETING MILISECOND DOES NOT EVEN REMOTELY CONSIST OF OR HAVE ANY RESEMBLANCE TO SAID PROCESS. THE LOWER COURT HAVING STATED THAT PLAINTIFF TWICE FAILED TO APPEAR IS FALSE AND PERHAPS THE FIGMENT OF IMAGINATION. TWO ORDERS WERE ISSUED TO DISCUSS "CASE STATUS" AFTER NOTICE OF APPEAL TO SUPERIOR WAS FILED. NEVER WAS THEIR AN ORDER TO ARGUE PRELIMINARY

V. Relief: OBJECTIONS.

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

PLAINTIFF IS ABLE TO ONLY STATE THAT MONETARY COMPENSATION CAN SURELY BE THE MAXIMUM ALLOWED UNDER STATUTE. IN ADDITION, THOSE RESPONSIBLE FOR THE COMMISION OF FELONIOUS ACTS AGAINST PLAINTIFF MUST BE HELD ACCOUNTABLE AND SERVE THEIR REQUIRED PENANCE. FURTHER, PLAINTIFF BELIEVES THAT A SMALL YET ACCEPTABLE COMPENSATION WOULD BE THE ISSUANCE OF A PAID-UP IN FULL MORTGAGE CONTRACT.

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\_\_\_\_\_  
\_\_\_\_\_

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 25TH day of JUNE, 2020.

Signature of Plaintiff Ralph L Douros

Mailing Address 39 PARK RD.  
BOYERTOWN, PA. 19512

Telephone Number 484-574-3180

Fax Number (if you have one) \_\_\_\_\_

E-mail Address rdouros42@gmail.co  
(internet not yet available at this loc.)

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, I am delivering this complaint to prison authorities to be mailed to the Clerk's Office of the United States District Court for the Eastern District of Pennsylvania.

Signature of Plaintiff: \_\_\_\_\_

Inmate Number \_\_\_\_\_

**CERTIFICATE OF COMPLIANCE**

I Certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

Jan 25, 2020  
Date

BY: Ralph L. Douros  
Ralph L. Douros  
Counsel pro se

\* As well as Federal RULES



**VERIFICATION**

I, Ralph L. Douros, hereby verify that the contents set forth in the foregoing Complaint to the U.S. District Court for Eastern Pennsylvania are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. 4904, and Federal Statutes relating to unsworn falsifications to authorities.

Date: June 25, 2020

By: Ralph L. Douros

**Certificate of Service**

I, Ralph L. Douros, hereby certify that true and correct copy of the foregoing Plaintiff's Complaint to the United States District Court, Eastern District of Pennsylvania was contemporaneously sent to the below listed address in the manner indicated on April 29, 2020 :

**By USPS Form 3817, Certificate of Mailing :**

Mr. Timothy Jones, Esq.  
1617 JFK Boulevard, Suite 1400  
Phila., Pa. 19103

Santander Bank, N.A.  
450 Penn St.  
Reading, Pa. 19106 Attn.: Legal

Ms. Abigail Brunner, Esq.  
1617 JFK Boulevard, Suite 1400  
Phila., Pa, 19103

Dovenmuehle Mortgage Inc.  
1 Corporate Dr.  
Lake Zurich, Ill. 60047-8945

Ms. Lauren R. Tabas, Esq  
1617 JFK Boulevard, Suite 1400  
Phila., Pa. 19103

Kevin Mayers, Authorized Santander signer  
C/O Santander Bank, N.A.  
450 Penn St.  
Reading, Pa. 19602

Mr. Scott Powell, former CEO  
C/O Santander Bank, N.A.  
75 State St.  
Boston, Mass. 02109

Judiciary, Commonwealth of Pa.  
C/O Supreme Court of Pa.  
601 Commonwealth Ave.  
Harrisburg, Pa. 17106-2575

Ms. Tara Kozak, Office Mgr.  
C/O Santander Bank, N.A.  
450 Penn St.  
Reading, Pa. 19602

Date: June 25, 2020

Signed: Ralph L. Douros

Ralph L. Douros, Counsel pro se  
39 Park Rd.  
Boyertown, Pa. 19512  
484-574-3180



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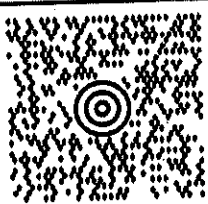
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PHILADELPHIA PA 19106-1737



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